

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2019 AUG 21 PM 4:31

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN MANZI,

Defendant.

SEALED OFFICE OF THE CLERK

4:19CR 3094

INDICTMENT

18 U.S.C. § 1030(a)(2), (c)(2)(B)(i),(iii)

The Grand Jury charges that

COUNT I

On or about the 1st day of July, 2017, within the District of Nebraska, and elsewhere, the defendant, JONATHAN MANZI, intentionally accessed and attempted to access a computer without authorization, and thereby obtained information from a protected computer of Google, LLC, for the Google email account of "T.P.", and the offense was committed for purposes of commercial advantage and private financial gain and the value of the information obtained exceeded \$5,000.

In violation of 18 U.S.C. § 1030(a)(2) and (c)(2)(B)(i) and (iii).

COUNT II

On or about the 1st day of July, 2017, within the District of Nebraska, and elsewhere, the defendant, JONATHAN MANZI, intentionally accessed and attempted to access a computer without authorization, and thereby obtained information from a protected computer of Dropbox, Inc., for the Dropbox account of Wepa, Inc., and the offense was committed for purposes of commercial advantage and private financial gain and the value of the information obtained exceeded \$5,000

In violation of 18 U.S.C. § 1030(a)(2) and (c)(2)(B)(i) and (iii).

COUNT III

On or about the 2nd day of July, 2017, within the District of Nebraska, and elsewhere, the defendant, JONATHAN MANZI, intentionally accessed and attempted to access a computer without authorization, and thereby obtained information from a protected computer of Dropbox, Inc., for the Dropbox account of Wepa, Inc., and the offense was committed for purposes of commercial advantage and private financial gain and the value of the information obtained exceeded \$5,000

In violation of 18 U.S.C. § 1030(a)(2) and (c)(2)(B)(i) and (iii).

COUNT IV


On or about the 2nd day of July, 2017, within the District of Nebraska, and elsewhere, the defendant, JONATHAN MANZI, intentionally accessed and attempted to access a computer without authorization, and thereby obtained information from a protected computer of Google, LLC, for the Google email account of "T.P.", and the offense was committed for purposes of commercial advantage and private financial gain and the value of the information obtained exceeded \$5,000.

In violation of 18 U.S.C. § 1030(a)(2) and (c)(2)(B)(i) and (iii).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.


STEVEN A. RUSSELL #16925
Assistant U.S. Attorney